

March 15, 2005

Filed Electronically

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: **In the Matter of Implementation of Section 304 of the
Telecommunications Act of 1996 (Commercial Availability
of Navigation Devices), CS Docket No. 97-80**

Dear Ms. Dortch:

On Monday, March 14, 2005, John Godfrey, Vice President, Government and Industry Affairs for Pioneer North America, Inc., and Jim Morgan (the undersigned), Director and Counsel, Government and Industry Affairs for Sony Electronics, Inc. spoke by telephone with Eric Bash, Legal Advisor to Commissioner Jonathan Adelstein. We discussed the following:

- The need for the Commission to require that “multi-stream” CableCARDS and testing procedures and tools to implement multi-stream CableCARD interfaces be made available for unidirectional cable-ready products by a date certain in the near future so as to enable consumer-friendly features such as recording one digital channel while watching another—a feature that is currently available to consumers only through equipment leased from cable operators, because cable operators’ equipment is not required to rely on CableCARDS and therefore does not suffer from the absence of multi-stream CableCARDS.
- The need for the Commission to provide oversight to ensure that the licensing terms for downloadable security will be reasonable, nondiscriminatory, and will not address in any way the features and functions of the host device other than the minimum necessary to protect cable networks from technical harm to the cable network, theft of service and protection of content.
- The need for the Commission to require that downloadable security technologies receive approval from an ANSI-accredited standards body.

Respectfully submitted,

(signed)

Jim Morgan
Director and Counsel, Government &
Industry Affairs

Ms. Marlene Dortch
March 15, 2005
Page 2

Sony Electronics, Inc.

cc: Mr. Eric Bash